

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
CHRISTINA SINHA, SBN 278893
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
MARIELA PANGANIBAN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00032-MCE
)
Plaintiff,) STIPULATION AND ORDER TO CONTINUE
) STATUS ON SENTENCING
vs.)
) Date: September 9, 2021
MARIELA PANGANIBAN,) Time: 10:00 A.M.
) Judge: Hon. Morrison C. England, Jr.
Defendant.)
_____)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney Matthew Thuesen, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Ms. Mariela Panganiban, that the status regarding sentencing, currently set for September 09, 2021, may be continued to **October 28, 2021, at 10:00 A.M.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status regarding sentencing on September 09, 2021. ECF No. 20.
2. By stipulation, the defense now moves to continue the status conference to October 28, 2021.
3. Undersigned defense counsel has been newly assigned this case. As such, she requires time to review the discovery in this matter and otherwise prepare for

1 sentencing.

2 4. Defense counsel believes that failure to grant the requested continuance would
3 deny her the reasonable time necessary for effective preparation, taking into
4 account the exercise of due diligence.

5 5. The government does not object to the continuance.

6 6. As this matter is post-plea, there are no Speedy Trial Act considerations.

7 7. Therefore, the parties respectfully request the Court to set this matter for a status
8 regarding sentencing on October 28, 2021 at 10:00 A.M.

9 Respectfully submitted,

10 HEATHER E. WILLIAMS
11 Federal Defender

12 Date: September 7, 2021

/s/ Christina Sinha
13 CHRISTINA SINHA
14 Assistant Federal Defender
Attorneys for Defendant
MARIELA PANGANIBAN

15
16 Date: September 7, 2021

PHILLIP A. TALBERT
Acting United States Attorney

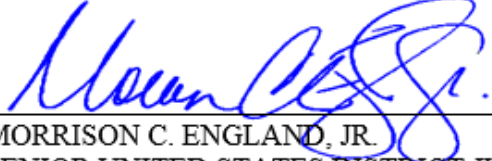
/s/ Matthew Thuesen
18 Matthew Thuesen
19 Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: September 7, 2021



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE